#### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

BORRAH E. CAMPBELL II,	)	
Plaintiff	)	CIVIL ACTION NO.
v.	)	2:06-CV-205-WHA-CSC
UNITED PARCEL SERVICE, INC.,	)	
Defendant.	)	
	)	

# <u>DEFENDANT UNITED PARCEL SERVICE, INC.'S FIRST REQUESTS FOR</u> <u>ADMISSIONS TO PLAINTIFF</u>

Defendant United Parcel Service, Inc. ("UPS") hereby requests that Plaintiff Borrah E. Campbell II ("Plaintiff") respond, under oath, to the following requests for admissions within thirty (30 days) of service of the requests on Plaintiff pursuant to Federal Rules of Civil Procedure 26 and 36. UPS further requests that Plaintiff supplement his responses as required by Federal Rule of Civil Procedure 26(e).

#### **REQUESTS FOR ADMISSIONS**

1.

Admit that you have filed not any charge or complaint with the federal Equal Employment Opportunity Commission regarding your employment with UPS.

2.

Admit that you have filed not any charge or complaint with any State administrative agency regarding your employment with UPS.

Served this 2/5 day of April 2006.

Lisa H. Cassilly Georgia Bar No. 116030 Jeremy D. Tucker Georgia Bar No. 142484 ALSTON & BIRD LLP 1201 West Peachtree Street Atlanta, Georgia 30309-3424 Tel. No. (404) 881-7000 Fax No. (404) 881-7777

William J. Baxley (BAX001) Donald R. James, Jr. (JAM016) BAXLEY, DILLARD, DAUPHIN McKNIGHT, & BARCLIFT 2008 3<sup>rd</sup> Avenue South Birmingham, Alabama 35233 Tel. No.: (205) 939-0995 Fax No.: (205) 271-1108

Attorneys for Defendant United Parcel Service, Inc.

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J
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### **CERTIFICATE OF SERVICE**

This is to certify that I have this date served a copy of the within and foregoing

## DEFENDANT UNITED PARCEL SERVICE, INC.'S FIRST REQUESTS FOR

**ADMISSIONS TO PLAINTIFF** by United States Mail with adequate first class postage affixed thereon, addressed as follows:

Borrah E. Campbell II 38 Fairlane Drive Montgomery, AL 36106

Plaintiff pro se

This  $2|^{51}$  day of April 2006.

Jeremy D. Tucker